

WNI 18-022691
Shapiro & DeNardo, LLC
14000 Commerce Parkway, Suite B
Mount Laurel, NJ 08054
(856)793-3080
Chandra M. Arkema - 029552006
Krystin M. Kane - 171402015
Katherine Knowlton Lopez - 013502011
Kathleen M. Magoon - 040682010
Donna L. Skilton - 013072007
Charles G. Wohlrab - 016592012
Courtney A. Martin - 098782016
Jeffrey Rappaport - 003431991

ATTORNEYS FOR WELLS FARGO BANK, N.A.

IN RE:

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

FRED A. ORDINE, JR., DEBTOR

CASE NO.: 16-21458-RG
CHAPTER 11

NOTICE OF OBJECTION TO CONFIRMATION

The undersigned, Shapiro & DeNardo, LLC, attorneys for the Secured Creditor, Wells Fargo Bank, N.A., the holder of a Mortgage on Debtor's property located at 33 Jenkins Road, Hewitt, NJ 07421; hereby objects to the Confirmation of the Debtor's proposed Chapter 11 Plan on the following grounds:

- 1) The proposed Chapter 11 Plan does not provide for the curing of the full amount of the mortgage arrears accrued at the time of the Bankruptcy filing to Secured Creditor as specified under 11 U.S.C. §1124(2)(A).
- 2) Debtor's Plan proposes to pay Secured Creditor \$0.00. Secured Creditor is owed pre-petition arrears in the amount of \$3,920.61.
- 3) The Chapter 11 Plan's failure to cure the full pre-petition arrearages amounts to an impairment of Secured Creditor's Claim pursuant to 11 U.S.C. §1124.
- 4) This Objection to Confirmation serves as notification of Secured Creditor's rejection or non-acceptance of the proposed Chapter 11 Plan per 11 U.S.C. §1126(a).

WHEREFORE, Wells Fargo Bank, N.A. respectfully requests that the Confirmation of Debtor's Chapter 11 plan be denied and that the Debtor be required to file an Amended Chapter 11 Plan providing for full payment of arrears due to the Secured Creditor.

SHAPIRO & DENARDO, LLC

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esquire

Dated: 5/9/18

WNI 18-022691

Shapiro & DeNardo, LLC

14000 Commerce Parkway, Suite B

Mount Laurel, NJ 08054

(856)793-3080

Chandra M. Arkema - 029552006

Krystin M. Kane - 171402015

Katherine Knowlton Lopez - 013502011

Kathleen M. Magoon - 040682010

Donna L. Skilton - 013072007

Charles G. Wohlrab - 016592012

Courtney A. Martin - 098782016

Jeffrey Rappaport - 003431991

ATTORNEYS FOR WELLS FARGO BANK, N.A.

IN RE:

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

FRED A. ORDINE, JR., DEBTOR

CASE NO.: 16-21458-RG
CHAPTER 11

HEARING DATE: MAY 22, 2018

CERTIFICATION OF SERVICE

I, Emily White

1. ☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Charles G. Wohlrab, Esquire, who represents the Secured Creditor in the above-captioned matter.

☐ am the _____ in the above case and am representing myself.

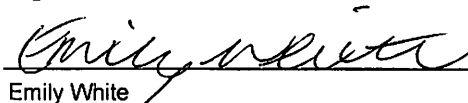
2. On May 14, 2018, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

Notice of Objection to Confirmation of Plan,

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Signature

Dated: May 14, 2018


Emily White

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Ilissa Churgin Hook Hook & Fatovich, LLC 1044 Route 23 North Suite 204 Wayne, NJ 07470		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Fred A. Ordine, Jr. 33 Jenkins Road Hewitt, NJ 07421		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

SHAPIRO & DeNARDO, LLC

ATTORNEYS AT LAW

A PENNSYLVANIA LIMITED LIABILITY COMPANY

14000 Commerce Parkway, Suite B

Mount Laurel, NJ 08054

Tel: (856) 793-3080 Fax: (847) 627-8809

GERALD M. SHAPIRO +++
DAVID S. KREISMAN **
CHRISTOPHER A. DeNARDO +

+ Licensed in New Jersey and Pennsylvania
++ Licensed in New Jersey and New York
+++ Licensed in Illinois and Florida
++++ Licensed in New Jersey and Florida
+++++ Licensed in Rhode Island and New Jersey
*+ Licensed in New Jersey, Pennsylvania, Florida
* Licensed in New Jersey Only
** Licensed in Illinois Only
*** Licensed in Pennsylvania Only

NJ Attorneys

CHANDRA M. ARKEMA +
Managing Partner – NJ
KATHLEEN M. MAGOON *
Supervising Foreclosure Attorney
KRYSTIN M. KANE+++++
KATHERINE KNOWLTON LOPEZ +
COURTNEY A. MARTIN*+
DONNA L. SKILTON +
CHARLES G. WOHLRAB +
JEFFREY RAPPAPORT*
GARY M. KANELIS ++
Of Counsel

May 9, 2018

United States Bankruptcy Court
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07102

In Re: Fred A. Ordine, Jr., Debtor
Case No: 16-21458-RG
Chapter: 11
Secured Creditor: Wells Fargo Bank, N.A.
Our file number: 18-022691

Dear Court Clerk:

Enclosed please find Notice of Objection to Confirmation, said Confirmation Hearing presently scheduled before the Court on May 1, 2018 at 11:00AM.

Thank you for your attention.

Very truly yours,
Shapiro & DeNardo, LLC

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esquire

Enclosures

cc: Ilissa Churgin Hook, Debtor's Attorney
Office of the US Trustee
Fred A. Ordine, Jr., Debtor
33 Jenkins Road
Hewitt, NJ 07421